

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE:	)	
	)	CASE NO. 18 B 12090
Candace Sofiya Beverly,	)	HON. A. Benjamin Goldgar
	)	CHAPTER 13
DEBTOR.	)	

**NOTICE OF MOTION**

TO: Marilyn O Marshall, 224 South Michigan Ste 800, Chicago, IL 60604, via electronic court notification;

See attached service list.

Please take notice that on November 27, 2018, at 9:30 a.m. I shall appear before the Honorable A. Benjamin Goldgar in Courtroom 642 of the United States Bankruptcy Court, Everett McKinley Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois 60604 and present the attached motion and you may appear if you so choose.

**PROOF OF SERVICE**

The undersigned, an attorney, certifies that she transmitted a copy of this notice and the attached motion to the attached service list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on November 2, 2018.

/s/ Brenda Likavec  
Attorney for Debtor

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
312-913-0625

Label Matrix for local noticing  
0752-1  
Case 18-12090  
Northern District of Illinois  
Chicago  
Fri Nov 2 10:25:47 CDT 2018

Chase  
3780 Old Norcross Rd  
Duluth Georgia 30096-1742

City of Chicago  
Department of Revenue  
Bureau of Parking Bankruptcy  
121 N LaSalle St Room 107A  
Chicago IL 60602-1232

Commonwealth Edison Co  
3 Lincoln Center  
Attn: Bankruptcy Section  
Oak Brook Terrace IL 60181-4204

Cook County Clerk  
118 N Clark St  
Fl 4  
Chicago Illinois 60602-1413

HARVARD COLLECTION SER  
4839 ELSTON AVE  
CHICAGO Illinois 60630-2589

Navient Solutions, LLC. on behalf of  
United Student Aid Funds, Inc.  
GLHEC and Affiliates  
PO BOX 8961  
Madison, WI 53708-8961

U.S. Department of Education C/O Nelnet  
121 South 13th Street, Suite 201  
Lincoln, NE 68508-1911

Brittney Mansfield  
The Semrad Law Firm, LLC  
20 S Clark St.  
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Chicago, IL 60603-1811

Patrick S Layng  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
Room 873  
Chicago, IL 60604-2027

Chase Card Services  
201 North Walnut Street  
Attn: Mark Pascale  
Mail Stop DE-1-1406  
Wilmington DE 19801-2920

City of Chicago - Parking  
Department of Revenue  
PO Box 88292  
Chicago Illinois 60680-1292

Commonwealth Edison Company  
Attn: Bankruptcy Department  
1919 Swift Drive  
Oakbrook Terrace, IL 60523-1502

DEPT OF EDUCATION/NELN  
121 S 13TH ST  
LINCOLN Nebraska 68508-1904

KEYNOTE CONS  
1501 West Dundee  
Buffalo Grove Illinois 60089-4006

Pullman Wheelworks  
901 E 104th St  
Chicago Illinois 60628-3093

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Candace Sofiya Beverly  
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End of Label Matrix  
Mailable recipients 27  
Bypassed recipients 0  
Total 27

Chaney, Angel  
605 E 71st St.  
Chicago IL 60619  
KEYNOTE CONS  
1501 West Dundee  
Buffalo Grove Illinois 60089-4006  
Chicago State University  
9501 S King Dr  
Chicago IL 60628-1598

City of Chicago Department of Finance  
c/o Arnold Scott Harris P.C.  
111 W Jackson Blvd Ste 600  
Chicago, IL 60604-3517

Comptroller State of Illinois  
PO Box 21937  
Chicago IL 60621-0937

Department of the Treasury  
Internal Revenue Service  
P.O. Box 7346  
Philadelphia PA 19101-7346

Navient  
PO Box 9640  
Wilkes Barre Pennsylvania 18773-9640

State Collection Inc.  
628 North St  
Geneva Illinois 60134-1356

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FOR THE NORTHERN DISTRICT OF ILLINOIS  
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IN RE:	)	
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**MOTION TO MODIFY PLAN**

NOW COMES the Debtor, Candace Sofiya Beverly, by and through Debtor's attorneys, The Semrad Law Firm, LLC hereby moves this Honorable Court to Modify the confirmed Chapter 13 Plan, Debtor states the following:

1. On April 25, 2018, Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
2. On September 11, 2018, this Honorable Court confirmed the Debtor's Chapter 13 Plan.
3. The proposed Chapter 13 Plan allows for secured creditors to be paid 100% of their allowed claims, and general unsecured creditors without priority to be paid 10% of their allowed claims.
4. The confirmed Chapter 13 Plan requires the Debtor to make plan payments to the Chapter 13 Trustee in the amount of \$200.00 monthly for 36 months.
5. Debtor has recently relocated and is out of work and needs time to find a new job.
6. Debtor wants to suspend payments for October, November and December to catch up while she gets settled.
7. Debtor respectfully requests this Honorable Court suspends payments for October 2018, November 2018 and December 2018 and for payments to resume January 2019.
8. Debtor further requests this Honorable Court defer the current plan default to the end of the plan of reorganization.

9. Debtor is in a position to proceed with the instant case.
10. Debtor filed the instant case in good faith and intends to complete the plan of reorganization.

WHEREFORE, the Debtor prays this Honorable Court for the following relief:

- A. That this Honorable Court enter an Order to suspend payments for October 2018, November 2018 and December 2018 and for payments to resume January 2019; and
- B. That this Honorable Court enter an Order deferring the current plan default to the end of the Chapter 13 Plan of reorganization; and
- C. For such other and further relief as the Court deems fair and proper.

Respectfully submitted,

/s/ Brenda Likavec  
*Attorney for Debtor*

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
312-913-0625